

# EXHIBIT 4

Declaration of Brian O. Noble

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

<b>WILLIAM C. MILES, SR.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>V.</b>	)	<b>CIVIL ACTION NO.</b>
	)	<b>4:19-CV-00756-CLM</b>
	)	
<b>WAL MART ASSOCIATES, INC.,</b>	)	
<b>WAL MART STORES EAST, LP,</b>	)	
	)	
<b>Defendant.</b>	)	

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**DECLARATION OF BRIAN O. NOBLE IN SUPPORT OF PETITION FOR  
THE AWARD OF ATTORNEY’S FEES AND COSTS**

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1. My name is Brian O. Noble. I submit this declaration in support of Plaintiff’s Petition for Attorney Fees in *William C. Miles, Sr. v. Walmart Associates, Inc.* Civil Action No. 4:19-cv-00756-CLM. This declaration is based on personal knowledge and on business records maintained by me in the ordinary course of business at Capstone Law. I am an adult resident of this judicial district and division and have personal knowledge of the matters set forth herein.

2. I earned my Juris Doctor degree from Cumberland School of Law, in 2010. I was awarded a Bachelor of Arts degree from The University of Mississippi in 2004.

3. I am an attorney licensed to practice law in Alabama. I have been licensed to practice in Alabama since 2010. I have been admitted to and represented clients in the United States Court of Appeals for the Eleventh Circuit, the Alabama Supreme Court, and the Alabama Court of Civil Appeals. I have appeared in the United States District Courts for the Northern, Middle, and Southern Districts of Alabama many times.

4. My entire practice has been on behalf of individuals or organizations seeking to secure equal treatment under the laws of the United States.

5. Based upon this information, the partners of Haynes & Haynes, P.C. and I determined, that a rate of \$400.00 per hour is reasonable.

6. An hour-by-hour, detailed list of the time I have devoted to this case is filed as Exhibit 4.

7. I reviewed each of the entries contained on Exhibit 4, entry-by-entry, to determine whether the entry should be reduced or red-lined from my fee petition. In that process, I did not identify any entries which, in my opinion, could be classified as excessive, redundant, or unnecessary under the applicable legal authority.

8. I believe that the hours identified on Exhibit 4 were necessary, reasonable and not excessive for a case of this complexity and detail. The number of hours on Exhibit 4 reflect the number of hours which I would have billed a paying client who was compensating me on an hourly basis for work performed on this case. I believe these hours are reasonable and fairly includable in a fee award pursuant to Title VII.

I declare under penalty of perjury that the foregoing is true and correct.



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Brian O. Noble

Date: September 30, 2021